



U.S. Department of Justice

United States Attorney
Southern District of New York

The Silvio J. Mollo Building
One Saint Andrew's Plaza
New York, New York 10007

September 10, 2019

FILED BY ECF

The Honorable Alison J. Nathan
United States District Judge
United States Courthouse
40 Foley Square
New York, New York 10007

Re: *United States v. Ali Sadr Hashemi Nejad*, 18 Cr. 224 (AJN)

Dear Judge Nathan:

At the conference today, the Court set a trial date of March 2, 2020. The Government respectfully requests that time be prospectively excluded under the Speedy Trial Act, 18 U.S.C. § 3161(h)(7)(A), between today and the start of trial, March 2, 2020. The Government submits that the ends of justice served by the exclusion of time outweigh the best interests of the public and the defendant in a speedy trial, because it will allow time for: (1) the Court to resolve the defendant's pending pre-trial motions; (2) both sides to prepare for trial; and (3) the parties to discuss possible pre-trial resolutions. The defendant, through counsel, has consented to this request.

Respectfully submitted,

GEOFFREY S. BERMAN
United States Attorney

by: /s/
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cc: All Defense Counsel (by ECF)